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**UNITED STATES BANKRUPTCY COURT
SOUTHERN DISTRICT OF NEW YORK**

IN RE:

DELPHI CORPORATION, et al.,

Debtors.

Chapter 11

**Case No.: 05-44481(RDD)
(Jointly Administered)**

**NOTICE OF MOTION OF KEYSTONE POWDERED METAL COMPANY
FOR ENTRY OF AN ORDER ACCEPTING KEYSTONE'S FILED
PROOF OF CLAIM PURSUANT TO FEDERAL RULES OF BANKRUPTCY
PROCEDURE 3003(c) AND 9006(b)(1)**

PLEASE TAKE NOTICE, that at a hearing on September 14, 2006 at 10:00 a.m. (Prevailing Eastern Time) and upon the attached motion (the "Motion"), Keystone Powdered Metal Company ("Keystone") will move before the Honorable Robert D. Drain, United States Bankruptcy Judge, in his courtroom located at the United States Bankruptcy Court for the Southern District of New York, Courtroom 610, United States Bankruptcy Court, Alexander Hamilton Custom House, One Bowling Green, New York, New York 10004 for the entry of an Order Accepting Keystone's filed Proof of Claim pursuant to Federal Rules of Bankruptcy Procedure 3003(c) and 9006(b)(1).

PLEASE TAKE FURTHER NOTICE that any responses or objections to the Motion must be in writing, shall conform to the Federal Rules of Bankruptcy Procedure and the Local Rules of Bankruptcy Court, and shall be filed with the Bankruptcy Court electronically in accordance with General Order M-242 (General Order M-242 and the User's Manual for the

electronic case filing system can be found at www.nysb.uscourts.gov, the official website for the Bankruptcy Court), by registered users of the Bankruptcy Court's case filing system, and by all other parties in interest, on a 3.5 inch disk, preferably in Portable Document Format (PDF), WordPerfect or any other Windows-based word processing format (with a hard-copy delivered directly to Chambers), and shall be served in accordance with the Supplemental Order under 11 U.S.C. § § 102(1) and 105 and Federal Rule of Bankruptcy Procedure 2002(m), 9006, 9007, and 9014 Establishing Omnibus Hearing Dates and Certain Notice, Case Management and Administrative Procedures dated March 17, 2006, as supplemented or amended, so as to be received on or before September 5, 2006, by (a) Buchanan Ingersoll & Rooney PC, 301 Grant Street, 20th Floor, Pittsburgh, Pennsylvania 15219 (Attn: Christopher P. Schueller, Esq.), (b) Delphi Corporation, 5725 Delphi Drive, Troy, Michigan 48098 (Attn: Joseph Papelian, Esq.), (c) Skadden, Arps, Slate, Meagher & Flom LLP, 333 West Wacker Drive, Suite 2100, Chicago, Illinois 60606 (Attn: John William Butler, Jr., Esq.), (d) Skadden, Arps, Slate, Meagher & Flom LLP, Four Times Square, New York, New York 10036 (Attn: Harim Zaltzman, Esq.), (e) Latham & Watkins LLP, 885 Third Avenue, New York, New York 10022, (Attn: Robert J. Rosenberg, Esq.), (f) Simpson Thatcher & Bartlett LLP, 425 Lexington Avenue, New York, New York 10017 (Attn: Marissa Wesley, Esq.), (g) Davis Polk & Wardwell, 450 Lexington Avenue, New York, New York 10017 (Attn: Marlane Melican, Esq.), (h) Office of the United States Trustee for the Southern District of New York, 337 Whitehall Street, Suite 2100, New York, New York (Attn: Alicia M. Leonhard, Esq.). Only those parties who have timely filed and served an objection to the Motion will be heard at the hearing.

Dated: August 2, 2006
Pittsburgh, Pennsylvania

Respectfully submitted,

BUCHANAN INGERSOLL & ROONEY PC

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